

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

VIRGINIA WOLF, *et al.*,

**Plaintiffs,**

**vs.**

SCOTT WALKER, *et al.*,

**Defendants.**

**Case No. 14-cv-64**

**DECLARATION OF PLAINTIFF VIRGINIA WOLF IN SUPPORT OF PLAINTIFFS’  
MOTION FOR A PRELIMINARY INJUNCTION**

I, Virginia Wolf, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a plaintiff in this lawsuit.
2. I was born in 1939, and I am 75 years old. I reside in Eau Claire, Eau Claire County, Wisconsin.
3. I am a professor emeritus of English at the University of Wisconsin-Stout, where I worked and taught for 24 years. I retired from the university on January 1, 2001. I am also a former minister in the Unitarian Universalist Church, and I remain an active church member.
4. I have been in a loving, committed, same-sex relationship with Carol Shumacher for more than 38 years. We were married in Minnesota on December 21, 2013, the 38th anniversary of our first date. I wish to have our marriage recognized in Wisconsin.
5. Carol and I live together in Eau Claire with our dog “Zee,” a border collie/Australian shepherd mix. When domestic partnerships became available in Wisconsin, Carol and I were the first couple in Eau Claire to sign up. We registered on August 3, 2009.
6. Together, Carol and I have raised two children. Our daughter Laura, known as Niña, is 47 and lives near Oshkosh with her husband. They have two daughters, our

granddaughters, ages 17 and 13. Our son David is 42 and lives in Cottage Grove with his two sons, our grandsons, ages 4 and 2.

7. I was born and raised in Kansas, where I met Carol. We moved to Wisconsin in 1977 when I accepted the job at the university.

8. I met Carol through mutual friends in Lawrence, Kansas. I was looking for someone to help with housekeeping and child care in exchange for room and board. At the time, I had two young children from a previous relationship. Carol and I ended up raising the children together.

9. My family is religiously conservative, and were not completely approving of me and Carol. Still, they were never unkind and have always included Carol and me in the family

10. In the 1980's Carol and I tried several times to sign up for a family membership at the YMCA in Eau Claire. The YMCA denied our applications because its policy was to refuse to recognize a same-sex couple as a family.

11. Carol and I face obstacles in taking care of each other that we would not face if we had been allowed to marry in Wisconsin. Over the years, I have had a few surgeries and other illnesses. On those occasions, Carol, who worked for the City of Eau Claire, was not permitted to take family leave to care for me. Before 2009, when Carol and I became domestic partners under Wisconsin's newly-enacted law, we could not be covered under each other's health insurance. If Carol had been recognized as my spouse, she could have been covered immediately.

12. On another occasion, I was in the emergency room with chest pains, and an emergency room nurse refused to let Carol into the treatment area to be with me. The apparent reason was that Carol was not legally my family.

13. Carol and I married in the Unitarian Universalist Church in Eau Claire on December 21, 1990, the 15th anniversary of our first date in 1975. A Unitarian minister officiated at the ceremony, where we wore silk suits and carried flowers. Our children gave us away. The temperature was below freezing that day, but the church was packed with family and friends. So was the party at our home afterward. The State of Wisconsin did not and does not recognize this marriage.

14. Carol and I were legally married in Minnesota on December 21, 2013. We've been inching towards matrimony for 38 years.

15. Because we married in Minnesota, Carol and I fear we could be arrested and prosecuted under Wisconsin's marriage evasion law, which makes it a crime to leave the state to enter a marriage that would be void or prohibited here.

16. What is most important to us is to have our marriage recognized under the laws of Wisconsin. Wisconsin is our home state. We have made our lives here and raised our family here. The protections and benefits we're missing out on are also crucially important to me. Because of my age, I am concerned that I might not survive to see my marriage with Carol recognized and that Carol would be denied the legal protections marriage would provide her at my death.

17. Our granddaughters would like to see our marriage recognized too. Last summer, I officiated as a Unitarian Universalist Minister at the wedding of a same-sex couple in Minneapolis that they attended. Both girls were really moved by the ceremony, and they talked about it a lot afterwards. They would like to see mine and Carol's love and commitment receive the same acknowledgement and respect in Wisconsin, their home state.

18. After 38 years of a committed, loving relationship and family life together, the State of Wisconsin still treats Carol and me as legal strangers. Carol and I look forward to the day when Wisconsin recognizes our relationship as deserving of the same legal protections, respect, and dignity that Wisconsin gives to marriages between different-sex spouses every day.

19. Carol and I are both over the age of 18, have the capacity to contract, are not within the degrees of consanguinity or affinity prohibited by law for a legal marriage, are not wards under a guardianship, and are not legally married to any other person. The only reason we are not permitted to marry in this state is because we are both women.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 24, 2014

/s Virginia Wolf  
Virginia Wolf